

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

Petitioner,

V.

M.B.D. No. 23-mc-91513-PBS

DAVID DELGIZZI, As President of
ADG, Inc.,

Respondent.

ORDER TO SHOW CAUSE

Boal, M.J.

Upon the Petition, the Exhibit(s) attached thereto, the Declaration of Revenue Officer Russell Silverstein, and upon the request of the Office of the United States Attorney for the District of Massachusetts, it is:

ORDERED that the respondent, David Delgizzi, as President of ADG, Inc., appear before the District Court of the United States for the District of Massachusetts, in Courtroom 14 in the United States District Courthouse, 1 Courthouse Way, Fifth Floor, Boston, MA on Wednesday, November 6, 2023 at 3:00 p.m., to show cause why he should not be compelled to obey the Internal Revenue Service Summons served on or about January 24, 2023.

It is further ORDERED that a copy of this Order, together with the Petition and Exhibit(s) thereto, be served upon David Delgizzi by hand delivery or by leaving it at Delgizzi's dwelling or usual place of abode or business with someone of suitable age and discretion who resides there, on or before October 6, 2023.

It is further ORDERED that by October 25, 2023, the respondent shall file and serve a written response to the Petition.

Date: September 22, 2023

/s/ Jennifer C. Boal

JENNIFER C. BOAL

United States Magistrate Judge